



June 29, 2017

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Room TW-A325
Washington, D.C. 20554

RE: ***Ex parte* filing** in WC Docket No. 15-118

Dear Ms. Dortch:

Richard McBurney, CEO and General Manager of Butler-Bremer Mutual Telephone Company Inc., Brian Ford of NTCA – The Broadband Association, and the undersigned from GVNW Consulting, Inc. (GVNW) conducted an *ex parte* meeting with Amy Bender of Commissioner O’Rielly’s office on June 29th, 2017.

We urged the Commission to expeditiously consider and grant the waiver requests filed by Butler-Bremer in its petition of May 12, 2015, noted that there were no comments filed in opposition to the petition during the comment cycle conducted in June of 2015, and recounted the *ex parte* meetings of April 19, 2016, at which we asked if any additional information would be helpful in prompt consideration of the waiver and were assured that the Commission had all the information necessary to make a decision. We noted the reply of former WCB Bureau Chief Matt DelNero to Sen. Ernst on October, 26, 2016, that with respect to the Butler-Bremer waiver requests the Commission would “make every effort to conclude its review as quickly and equitably as possible.” We also discussed the most recent *ex parte* meeting on these same waiver requests with the WCB held on March 28, 2017.

We emphasized that delay in addressing the waiver has prevented and will continue to prevent Butler-Bremer from saving approximately \$45,000 annually in accounting, reporting and other administrative costs. We noted that consolidation of the access rate bands for the merged study are revenue neutral and that the requested study area merger has no adverse impact on CAF-ICC.

Finally, we discussed whether there were any ways small companies seeking waivers could structure such requests in order to expedite their consideration.

As required by the Commission's rules, this *ex parte* record is now filed in the above-referenced docket. If there are any questions, please call me on 301-738-0020.

Respectfully submitted,

Via ECFS 6/29/2017

David B. Cohen, Esq.
Senior Policy Advisor
GVNW Consulting, Inc.

Copy to:
Amy Bender, FCC